

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (BOSTON)**

ERNESTO DARQUEA,

Plaintiff,

V.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, and DENIS K. BERUBE,

Defendants.

Case No. 1:05-cv-10438-MLW

**MOTION OF THE TURNBERRY ASSET GROUP FOR CONSOLIDATION,
APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S
SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL**

GERALD D. BRODER,

Plaintiff,

v.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, and DENIS K. BERUBE,

Defendants.

JOHN FLYNN, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, and DENIS K. BERUBE,
BUDDY G. BECK, MARCEL YON, and
THOMAS J. REILLY,

Defendants.

MIN CHANG, Individually, and On behalf
of All Others Similarly Situated,

Plaintiffs,

v.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, and DENIS K. BERUBE,

Defendants.

Case No. 1:05-cv-10475-MLW

Case No. 1:05-cv-10498-MLW

Case No. 1:05-cv-10537-MLW

JOSEPH MARTIN, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, and DENIS K. BERUBE,

Defendants.

DAPENG LUO,

Plaintiff,

v.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, DENIS K. BERUBE, BUDDY G.
BECK, MARCEL YON, THOMAS J.
REILLY, and CHARLES E. LEVINE

Defendants.

Case No. 1:05-cv-10577-MLW

Case No. 1:05-cv-10615-MLW

WAYNE CLARK, Individually and on
behalf of All Others Similarly Situated,

Plaintiff,

v.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, and DENIS K. BERUBE,

Defendants.

OLYMPIA LEVINSON STIEGELE,

Plaintiffs,

v.

BERNARD BAILEY, PAUL T.
PRINCIPATO, PETER NESSEN,
THOMAS J. REILLY, B. G. BECK.
CHARLES E. LEVINE, WILLIAM K.
AULET, and VIISAGE TECHNOLOGY,
INC.,

Defendants.

Case No. 1:05-cv-10578-MLW

Case No. 1:05-cv-10677-MLW

TURNBERRY ASSET MANAGEMENT,
on behalf of itself and all others similarly
situated,

Plaintiff,

v.

VIISAGE TECHNOLOGY, INC.,
BERNARD BAILEY, WILLIAM K.
AULET, DENIS K. BERUBE, BUDDY G.
BECK, MARCEL YON, THOMAS J.
REILLY, CHARLES E. LEVINE,
HARRIET MOUCHLY-WEISS, PAUL T.
PRINCIPATO, and PETER NESSEN,

Defendants.

Case No. 1:05-cv-10725-MLW

Turnberry Asset Management, Electronic Trading Group L.L.C., Ronald Sauer, and David and Lance Hancock (collectively, the “Turnberry Asset Group ” or “Movants”), by their counsel, hereby move this Court for an Order: (i) consolidating the above-captioned actions; (ii) appointing the Turnberry Asset Group as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (iii) approving the Turnberry Asset Group’s selection of Entwistle & Cappucci LLP and Klafter & Olsen LLP as Co-Lead Counsel, and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel of the actions, pursuant to the PSLRA. In support of this Motion, Movants submit herewith a Memorandum of Law, a Declaration, and a [Proposed] Order.

REQUEST FOR ORAL ARGUMENT

Movants respectfully request oral argument on this motion.

DATED: May 9, 2005
Boston, Massachusetts

Respectfully submitted:

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**
By: /s/ Leslie R. Stern
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Proposed Liaison Counsel

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Proposed Co-Lead Counsel

LOCAL RULE 7.1 CERTIFICATE

I, William W. Wickersham, hereby certify that on May 9, 2005, I consulted by telephone with Mitchell H. Kaplan, Esquire, of Choate Hall & Stewart LLP, counsel for defendants concerning the within Motion to Consolidate, which defendants do not oppose, but take no position with regard to actions that have not yet been served on defendants or their counsel. I also informed Mr. Kaplan of the Motion for Appointment of Lead Plaintiff, and Approval of Lead Plaintiffs' Selection of Co-Lead Counsel and Liaison Counsel. The issue cannot be resolved or narrowed because the filing of the Motion is required by statute.

/s/ William W. Wickersham
William W. Wickersham